

BAILEY COWAN HECKAMAN PLLC

Robert W. Cowan (admitted *pro hac vice*)  
rcowan@bchlhw.com  
Aaron M. Heckaman (admitted *pro hac vice*)  
aheckaman@bchlhw.com  
1360 Post Oak Blvd., Suite 2300  
Houston, TX 77056  
Telephone: 713-425-7100  
Facsimile: 713-425-7101  
onewheel@bchlhw.com

*Attorneys for Ron Bunnell, on behalf of the  
Estate of Carl Joseph Bunnell, deceased,  
Barclay Bunnell, Misty Odeen, as next friend  
and representative of Maxwell Bunnell, a  
minor, Darryl Martin John Oatridge, and  
Bridget Oatridge*

*Additional parties and counsel listed on  
signature pages*

NILAN JOHNSON LEWIS PA

John J. Wackman (admitted *pro hac vice*)  
jwackman@nilanjohnson.com  
Christine M. Mennen (admitted *pro hac vice*)  
cmennen@nilanjohnson.com  
Kathleen K. Curtis (admitted *pro hac vice*)  
kcurtis@nilanjohnson.com  
Kelly P. Magnus (admitted *pro hac vice*)  
kmagnus@nilanjohnson.com  
250 Marquette Avenue South, Suite 800  
Minneapolis, MN 55401  
Tel: (612) 305-7500  
Fax: (612) 305-7501

*Attorneys for Defendant Future Motion, Inc.*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

IN RE: FUTURE MOTION, INC.

PRODUCTS LIABILITY LITIGATION

\_\_\_\_\_  
This document relates to:

ALL ACTIONS

No.: 5:23-md-03087-BLF

**JOINT STIPULATION REGARDING  
RECOMMENDATION OF MAGISTRATE  
JUDGE**

**JOINT STIPULATION**

Pursuant to this Court's Case Management Order No. 1 (ECF No. 56), the Parties jointly recommend the appointment of Magistrate Judge Laurel Beeler to preside over the Parties' efforts to settle their respective cases. Alternately, if Magistrate Judge Beeler is unavailable, the Parties jointly recommend the appointment of either Magistrate Judge Susan van Keulen or Magistrate Judge Joseph Spero for this purpose.

**STIPULATED AND AGREED TO BY:**

Dated: February 1, 2024

Respectfully submitted,

HAGENS BERMAN SOBOL SHAPIRO LLP

By: /s/ Jerrod C. Patterson

Jerrod C. Patterson (admitted *pro hac vice*)  
Joseph M. Kingerski (admitted *pro hac vice*)  
1301 Second Avenue, Suite 2000  
Seattle, WA 98101  
Telephone: (206) 623-7292  
Facsimile: (206) 623-0594  
Email: jerrodp@hbsslaw.com  
Email: joeyk@hbsslaw.com

*Attorneys for James Loh, Sean Michael Smith, Giovany Rico, Bradley Reber, Raymond Wang, Christopher Foo, Devon Holt, Valentina Forcella, Derek Guilford, James Grant, Johnny Leombruno, Carlos Murphy, Stephen Powell, Richard Bonner, Joshua Flott*

BAILEY COWAN HECKAMAN PLLC

By: /s/ Robert W. Cowan

Robert W. Cowan (admitted *pro hac vice*)  
Aaron M. Heckaman (admitted *pro hac vice*)  
1360 Post Oak Blvd., Suite 2300  
Houston, TX 77056  
Telephone: 713-425-7100  
Facsimile: 713-425-7101  
Email: aheckaman@bchlhw.com  
Email: rcowan@bchlhw.com

*Attorneys for Plaintiffs Ron Bunnell, on behalf of the Estate of Carl Joseph Bunnell, deceased, Barclay Bunnell, Misty Odeen, as next friend and representative*

1 *of Maxwell Bunnell, a minor, Darryl Martin John*  
2 *Oatridge, and Bridget Oatridge*

3 -and-

4 MORGAN & MORGAN  
5 Rene F. Rocha (*pro hac vice* anticipated)  
6 COMPLEX LITIGATION GROUP  
7 400 Poydras St., Suite 1515  
8 New Orleans, LA 70130  
9 Telephone: (954) 318-0268  
10 Facsimile: (954) 327-3018  
11 Email: rrocha@ForThePeople.com

12 *Attorneys for Jason Bailey, Christopher Delapaz,*  
13 *Schuyler Elliot, Brandon Greer, Michael Haggerty,*  
14 *Orlando Lopez-Roman, Ralph Nacca, Ian Quincannon,*  
15 *Jonathan Reeves, Kevin Roesler, Joel Thomas*

16 By: /s/ Gregory Haroutunian

17 CLAYEO C. ARNOLD,  
18 A PROFESSIONAL CORPORATION  
19 M. Anderson Berry (SB# 262879)  
20 Gregory Haroutunian (SB# 330263)  
21 865 Howe Avenue  
22 Sacramento, CA 95825  
23 Telephone: (916) 239-4778  
24 Facsimile: (916) 924-1829  
25 Email: aberry@justice4you.com  
26 Email: gharoutunian@justice4you.com  
27 Email: bjack@justice4you.com

28 - and -

MORGAN & MORGAN, P.A.

Branden Weber (*pro hac vice* forthcoming)  
20 North Orange Avenue, Suite 1600  
Orlando, FL 32801  
Telephone: (407) 420-1414  
Facsimile: (407) 245-3408  
Email: bweber@forthepeople.com

*Counsel for Plaintiffs and the Proposed Class*

Dated: February 1, 2024

NILAN JOHNSON LEWIS PA

By: /s/ John Wackman

John J. Wackman (admitted *pro hac vice*)  
Christine M. Mennen (admitted *pro hac vice*)  
Kathleen K. Curtis (admitted *pro hac vice*)  
Kelly P. Magnus (admitted *pro hac vice*)  
250 Marquette Avenue South, Suite 800  
Minneapolis, MN 55401  
Telephone: (612) 305-7500  
Facsimile: (612) 305-7501  
Email: jwackman@nilanjohnson.com  
Email: cmennen@nilanjohnson.com  
Email: kcurtis@nilanjohnson.com  
Email: kmagnus@nilanjohnson.com

*Attorneys for Defendant Future Motion, Inc..*

**ADDITIONAL PLAINTIFFS' COUNSEL:**

<p>Eitan Goldrosen (admitted <i>pro hac vice</i>) MORGAN &amp; MORGAN, P.A. 20 North Orange Avenue, Suite 1600 Orlando, Florida 32801 Telephone: (407) 420-1414 Email: egoldrosen@forthepeople.com</p> <p><i>Attorneys for Jason Bailey, Christopher Delapaz, Schuyler Elliot, Brandon Greer, Michael Haggerty, Orlando Lopez-Roman, Ralph Nacca, Ian Quincannon, Jonathan Reeves, Kevin Roesler, Joel Thomas</i></p>	<p>Rachel M. Luke (admitted <i>pro hac vice</i>) Michael Angiulo (admitted <i>pro hac vice</i>) FRIEDMAN   RUBIN PLLP 1109 1st Avenue, Suite 501, Seattle, WA 98101 Telephone: (206) 501-4446 Facsimile: (206) 623-0794 Email: Rachel@friedmanrubin.com</p> <p><i>Attorney for Plaintiffs Whitney Young and Mary Kokstis</i></p>
<p>Michael K. Johnson, Esq. (admitted <i>pro hac vice</i>) Adam Kress (admitted <i>pro hac vice</i>) JOHNSON BECKER, PLLC 444 Cedar Street, Suite 1800, St. Paul, MN 55101 Telephone: (612) 436-1800 Facsimile: (612) 436-1801</p> <p><i>Attorney for Matthew Boston, Jonathan Burke, and Christopher Emmel</i></p>	<p>Craig Hoffman (admitted <i>pro hac vice</i>) MACK, TRAGOS &amp; HOFFMAN, LTD. 53 West Jackson Blvd., Suite 815 Chicago, IL 60604 Telephone: (312) 242-2454 (Direct) Facsimile: (312) 284-1865 Email: CHoffman@MTH-law.com</p> <p><i>Attorney for Plaintiffs Keith Gregie and John Scherschel</i></p>
<p>Joe Mooneyham (admitted <i>pro hac vice</i>) MOONEYHAM BERRY, LLC Post Office Box 8359 Greenville, South Carolina 29604 Telephone: (864) 421-0036 Facsimile: (864) 421-9060 Email: joe@mbllc.com</p> <p><i>Attorney for Samuel King</i></p>	<p>Daniel C. Jensen, Esq. (<i>pro hac vice</i> anticipated) Florida Bar No. 0112566 LYTAL, REITER, SMITH, IVEY &amp; FRONRATH 515 N. Flagler Drive, 10th Floor West Palm Beach, FL 33401 Telephone: (561) 655-1990 Direct Line: (561) 820-2229 Facsimile: (561) 820-2299 Primary e-service: djensen@foryourrights.com Secondary e-service: kharris@foryourrights.com</p> <p><i>Attorney for Victor McNair, Anh Truong, Scott, Patrick, Shane Smith, and Kwynn Koop</i></p>

Matthew K. Felty (admitted *pro hac vice*)  
 LYTLE SOULÉ & FELTY, P.C.  
 1200 Robinson Renaissance  
 119 N. Robinson Ave.  
 Oklahoma City, OK 73102  
 Telephone: (405) 235-7471  
 Facsimile: (405) 232-3852  
 Email: mkfelty@lytlesoule.com

- and -

Phillip G. Whaley (admitted *pro hac vice*)  
 RYAN WHALEY  
 400 N. Walnut Ave.  
 Oklahoma City, OK 73104  
 Telephone: (405) 239-6040  
 Facsimile: (405) 239-6766  
 Email: pwhaley@ryanwhaley.com

*Attorneys for Plaintiff Grant Downs*

Timothy F. Pearce, Esq.  
 Stuart B. Lewis  
 Anya Fuchs, Esq.  
 PEARCE LEWIS LLP  
 423 Washington Street, Suite 510  
 San Francisco, CA 94111  
 Telephone: 415-964-5225  
 Facsimile: 415-830-9879  
 Email: tim@pearcelewis.com  
 Email: stuart@pearcelewis.com  
 Email: anya@pearcelewis.com

*Attorneys for Darryl Martin John Oatridge,  
 and Bridget Oatridge*

Thomas H. Murphy, Esq.  
 COGAN & POWER, P.C.  
 One East Wacker Drive, 38th Floor  
 Chicago, Illinois 60601  
 (312) 477-2500  
 (312) 477-2501 (Fax)  
 tmurphy@coganpower.com

*Attorney for Plaintiff, Jason Brown*

Lowell P. McKelvey (admitted *pro hac vice*)  
 MCKELVEY LAW LLC  
 1205 NW 25th Avenue,  
 Portland, Oregon 97210  
 Telephone: (503) 349-7535  
 Facsimile: (971) 357-2142  
 Email: lowell@mckelveylaw.com

*Attorney for Plaintiff Keith Gregie, John  
 Scherschel, and Bryan Reedy*

Eli J. Hare (*pro hac vice* anticipated)  
 Dicello Levitt LLP  
 505 20th Street North, Suite 1500  
 Birmingham, Alabama 35203  
 Telephone: 205-855-5700  
 Email: ehare@dicellolevitt.com

*Attorney for Caleb Metts*

Cameron Bell (admitted *pro hac vice*)  
 Oliver Law Group P.C.  
 50 W. Big Beaver Rd., Suite 200  
 Troy, MI 48084  
 Telephone: 248-327-6556  
 Facsimile: 248-436-3385  
 Email: cbell@oliverlawgroup.com

*Attorney for Thomas Nemeth*

**LOCAL RULE 5-1 ATTESTATION**

I hereby attest, pursuant to Civil L.R. 5-1(i)(3) that the concurrence to the filing of this document has been obtained from each signatory hereto.

By: /s/ Jerrod C. Patterson  
Jerrod C. Patterson